

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 16-cv-01414
	)	(Consolidated Class Action)
HARRIS COUNTY, TEXAS, et al.	)	The Honorable Lee H. Rosenthal
	)	U.S. District Judge
Defendants.	)	
	)	

**NOTICE OF FILING OF FIRST SIX MONTH REPORT  
BY THE FEDERAL COURT MONITOR**

The *O'Donnell* Consent Decree requires the Monitor to “conduct reviews every six (6) months for the first three years the Monitor is in place . . . to determine whether the County, CCCL Judges, and Sheriff have substantially complied with the requirements of the Consent Decree.” *O'Donnell v. Harris County*, Case 4:16-cv-1414 (S.D. Tex. Nov. 21, 2019), Dkt. 708 ¶ 115. The Decree further requires the Monitor to file with the Court, and requires the County to publish, “written public reports regarding the status of compliance with th[e] Consent Decree[.]” *Id.* ¶ 117. Section 122 specifically requires the reports to “be filed with the Court on the public docket[.]” *Id.* ¶ 122 On behalf of the Federal Court Monitor, and consistent with the requirements of Sections 115, 117, and 122 of the Consent Decree, the Parties jointly file the First Six Month Report on behalf of the independent Monitor.

Date: September 3, 2020

Respectfully Submitted,

/s/ Alec Karakatsanis  
/s/ Elizabeth Rossi  
Alec George Karakatsanis  
alec@civilrightscorps.org  
Elizabeth Rossi

/s/ Neal S. Manne  
Neal S. Manne  
Texas Bar No. 12937980  
nmanne@susmangodfrey.com  
Lexie G. White

elizabeth@civilrightscorps.org  
Civil Rights Corps  
1601 Connecticut Ave NW, Suite 800  
Washington, DC 20009  
Telephone: (202) 681-2721

Texas Bar No. 24048876  
lwhite@susmangodfrey.com  
Joseph S. Grinstein  
Texas Bar No. 24002188  
jgrinstein@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666

/s/ Michael Gervais  
Michael Gervais  
mgervais@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, #1400  
Los Angeles, CA 90067  
Telephone: (310) 789-3100

*Attorneys for Plaintiffs*

VINCE RYAN, HARRIS COUNTY ATTORNEY

/s/ Rachel Fraser  
Rachel Fraser  
Assistant County Attorney  
Federal I.D. 2553428  
State Bar No. 24079725  
1019 Congress, 15<sup>th</sup> Floor  
Houston, Texas 77002  
Telephone: (713) 274-5383  
Facsimile: (713) 755-8823  
[rachel.fraser@cao.hctx.net](mailto:rachel.fraser@cao.hctx.net)

/s/ Brandon Draper  
Brandon Draper  
SBOT: 24096064  
Federal (Southern District) No. 3098164  
1019 Congress Plaza, 15th Floor  
Houston, TX 77002  
(713) 274-5358 (telephone)  
(713) 755-8823 (facsimile)  
[brandon.draper@cao.hctx.net](mailto:brandon.draper@cao.hctx.net)



G. Allan Van Fleet, P.C.  
Texas Bar No. 20494700  
6218 Elm Heights LN, Suite 201  
Houston, TX 77081-2409  
(713) 826-1954  
[allanvanfleet@gmail.com](mailto:allanvanfleet@gmail.com)

*ATTORNEY FOR DEFENDANTS  
COUNTY CRIMINAL COURTS AT LAW  
JUDGES*

*ATTORNEYS FOR HARRIS COUNTY*

/s/ Victoria Jimenez

OF COUNSEL, VINCE RYAN  
Harris County Attorney

VICTORIA L. JIMENEZ

Assistant County Attorney

Federal I.D. No. 2522937

State Bar No. 24060021

1861 Old Spanish Trail

Houston, Texas 77054

Telephone: (832) 927-5211

Facsimile: (713) 755-8924

E-mail: [victoria.jimenez@cao.hctx.net](mailto:victoria.jimenez@cao.hctx.net)

/s/ Murray Fogler

Murray Fogler

FOGLER, BRAR, FORD,

O'NEIL & GRAY, LLP

2 Houston Center

909 Fannin St, Suite 1640

Houston, Texas 77010

(713) 481-1010

(713) 574-3224 (Fax)

*Attorneys for Defendant Sheriff Ed Gonzalez*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of September 2020, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Elizabeth Rossi  
Elizabeth Rossi